UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

PHILLIP NELSON BURNS, MIRJANA PAVKOVICH, Administrator of the Estate of Rade Pavkovich, Deceased, and WARREN ELMER HALPAP,

Plaintiffs,

-against-

GRUPO MÉXICO, S.A. de C.V., a Mexican Corporation,

Defendant.

Case No. 1:07-CV-3496(WHP)

JOINT MOTION BY GRUPO MÉXICO S.A.B. DE C.V., ASARCO LLC AND SOUTHERN PERU HOLDINGS, LLC TO EXTEND TIME TO FILE MEMORANDA OF LAW IN OPPOSITION TO PENDING MOTIONS

Defendant Grupo México S.A.B. de C.V. ("<u>Grupo México</u>") and ASARCO LLC and Southern Peru Holdings, LLC (together with Grupo México, the "<u>Movants</u>"), submit this unopposed motion for the extension of time for:

Grupo México to file its response to ASARCO LLC and Southern Peru Holdings, LLC's Motions to Substitute Plaintiffs and to Transfer Venue; and for

ASARCO LLC and Southern Peru Holdings, LLC to file their response to Grupo México's Motion to Remand or in the Alternative, to Dismiss the Amended Complaint for Improper Service and Lack of Personal Jurisdiction.

The Movants agree that responses shall be filed with the Court and served upon each other on Tuesday, July 10, 2007.

Dated: July 9, 2007

BAKER BOTTS L.L.P.

G. Irvin Terrell, Jr. (GT-3459)

Attorney-in-Charge

Texas State Bar No. 19794500

Samuel Cooper

By:

Texas State Bar No. 00792427

Michael Massengale

Texas State Bar No. 24003704

Rebeca Huddle

Texas State Bar No. 24012197

910 Louisiana Street

One Shell Plaza

Houston, Texas 77002-4995

(713) 229-1231

(713) 229-2831 (facsimile)

Jack Kinzie

Texas State Bar No. 11492130

Fernando Rodriguez

Texas State Bar No. 24005048

Eric A. Söderlund

Texas State Bar No. 24037525

Thomas E. O'Brien

Texas State Bar No. 24046543

2001 Ross Avenue

Dallas, Texas 75201-2980

(214) 953-6500

(214) 661-6503 (facsimile)

JORDAN, HYDEN, WOMBLE, CULBRETH & HOLZER, P.C.

> Shelby A. Jordan Texas State Bar No. 11016700 Suite 900, Bank of America 500 North Shoreline Corpus Christi, Texas 78471 (361) 884-5678 (361) 888-5555 (facsimile)

MILBANK, TWEED, HADLEY & MCCLOY LLP

Luc A. Despins (LD 5143)

Stacey J. Rappaport (SR 9973)

Alan J. Stone (AS 2045)

J. Ryan Miller (JM 3370)

1 Chase Manhattan Plaza

New York, NY 10005-1413

(212) 530-5000

(212) 530-5219 (facsimile)

David S. Cohen (DC 1268)

Donna F. Mulvihill (DM 6644)

International Square Building

1850 K Street, NW, Suite 1100

Washington D.C. 20006

(202) 835-7500

(202) 835-7586 (facsimile)

Attorneys for Defendant GRUPO MÉXICO, S.A. DE C.V., A MEXICAN CORPORATION

-and-

Michael J. Urbis Texas State Bar No. 20414130 1534 E. 6th Street, Suite 104 Brownsville, Texas 78520 (956) 542-1161 (956) 542-0051

Counsel to ASARCO LLC and Southern Peru Holdings, LLC